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PACIFIC TELESIS
Group-Washington

October 12, 1995

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 95-116, RM-8534 - Telephone Number Portability*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their *"Reply Comments"* in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Alan F. Ciamporcero (JZB)

Enclosure

No. of Copies rec'd 0+6
List ABCDE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	RM ~~8534~~ 8535
	)	

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

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SUMMARY

The Federal Communications Commission ("Commission") should develop national policies and guidelines to ensure network reliability and interoperability of state-adopted permanent number portability solutions. As there is no proven technical solution to number portability, the Commission should decline to adopt any particular proposal but should leave the technical standards work to appropriate industry fora. State regulatory bodies should help establish particular solutions, and implementation timelines. The Commission should assist in resolving cost recovery issues for number portability, especially for interoperability.

Industry members must equally share the costs and the responsibility for implementing all number portability solutions. If the Commission or the states consider mid-term or entrance solutions, these solutions must recover their costs within the time frame they exist. They should also have the ability to evolve into long term solutions. For long-term solutions to number portability, the Commission should adopt a national policy promoting competitively neutral cost recovery. The suggestion by a few parties that incumbent Local Exchange Carriers ("LECs") be punished because permanent number portability does not exist is definitely not neutral and must be rejected. These so-called incentive measures punish LECs alone when the responsibility for finding a long-term solution to number portability rests with all industry players.

Finally, we believe that the Commission can and should articulate broad national principles to guide states and the industry in fashioning number portability solutions that

comply with federal regulatory goals. The Commission can articulate these guidelines without preempting state action in this area.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	RM 8534
	)	

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pursuant to Sections 1.415 and 1.419 of the Commission's rules, we hereby file our reply comments on the Commission's Notice of Proposed Rulemaking in the above-referenced proceeding.[1]

I. Introduction

Nearly seventy parties filed comments in this proceeding.[2] These parties include Local Exchange Companies, Cable Companies, Interexchange carriers, Competitive Access Providers, Regulators, Cellular and Paging Carriers as well as other interested parties and associations. The collective comments of this divergent group are remarkable in that the parties agree in many areas.

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1 See In the Matter of Telephone Number Portability, Notice of Proposed Rulemaking, CC Docket No. 95-116, RM 8535 (released July 13, 1995) (hereinafter "Portability NPRM").

2 Customers are not represented in this group. However, public hearings held at the state commission level ensures that we will hear from customers about their views on number portability.

Most parties agree that the Federal Communications Commission ("Commission") should develop broad policy objectives and guidelines, but should not adopt a particular technology for service provider number portability. Virtually no one suggested that state trials should stop or that interim measures are inappropriate for the short term. Commenters recommend that the Commission allow industry fora to develop technical standards for implementation, arguing that these bodies are better suited to the task. Most parties also urged the Commission to adopt broad policy objectives and guidelines for number portability solutions and leave other issues to state regulators.

While the comments do not represent a consensus on every issue, almost all commenting parties agree that the Commission should focus its efforts in the area of service provider number portability and defer to a later date those additional issues raised by service and location number portability. Therefore, in these reply comments, we address only service provider number portability.

II. The Commission's role should be to develop national policies and guidelines and leave other issues to state commissions and industry fora.

1. The Commission should adopt high level goals and guidelines to ensure network reliability and the interoperability of permanent number portability solutions.

Parties offering comments in this NPRM agree that there is a federal interest in number portability.[3] Deploying different solutions across the country could have an effect on the provision of interstate telecommunications, particularly in the areas of

[3] See e.g., AirTouch Comments, pp. 8-9; NexTel Comments, pp. 9-10; Missouri Public Service Commission Comments, pp. 6-7; MFS Comments, p. 6; Nynex Comments, p. 2.

network reliability and network interoperability. We join others in recommending that the Commission limit its role to defining broad policy goals and interoperability standards to meet the federal interest.

We also join other commenters in cautioning the Commission to avoid unilaterally undertaking to develop or choose specific technical solutions, interfaces, or protocols for long-term number portability solutions.[4] A broad industry group composed of technical experts can better resolve these issues. The Commission should monitor progress for specific technical solutions to meet its specific concerns.

The Commission does not have enough information on number portability to adopt a solution, even though several commenters offered various proposals they allege are long term solutions. All of these proposals would have an unknown impact on the telephone network, would require new switch software, deployment of vast network databases, and changes to current signaling protocol. In addition, it is unknown what effect these proposals will have on existing operational, administrative and billing systems. For example no one has examined the impact on such basic services as Directory Assistance and Operator Assistance. Each service has unknown technical considerations and upgrade requirements as the network and operation systems manage the deployment of number portability. For these reasons, the Commission cannot know now what solution would best serve the dual federal interests of interoperability and network reliability.

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[4] See e.g., TDS Telecommunications Corporations Comments, pp. 3-4; MCI Comments, pp. 5-6; MFS Comments, p.6; NARUC Comments, p. 3; Nynex Comments, p. 2.

To fulfill its role, the Commission should use the comments gathered in this proceeding as well as the information gleaned from various states' long-term number portability trials to develop the national policy and guidelines needed. To facilitate this information gathering, the Commission should appoint an industry body to advise the Commission in defining broad policy objectives for a long term solution.[5]

2. State commissions should decide the desirability of interim measures.

Nearly all commenters agree that interim number portability solutions, although not ideal, are necessary in the short term.[6] The benefits of implementing an interim solution involve time, availability, and cost. The technology for interim solutions exists today. In contrast to long-term solutions, no time is required to develop new standards and we know these measures are less expensive than a long term solution and can recover their costs.

In California, the state regulator has already concluded that it will implement local exchange competition even though a long-term number portability solution does not exist.[7] For interim number portability, the California Commission has also concluded that the Competitive Local Exchange Carriers ("CLECs") will be able to purchase Remote Call Forwarding ("RCF") from the LEC at the LEC's direct embedded cost.[8]

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5 The appropriate industry standard setting bodies could be either existing organizations such as the Industry Numbering Committee ("INC") or Committee T1, or the yet to be created North American Numbering Council ("NANC").

6 See e.g., National Cable Television Association Comments, pp. 3-4; CompTel Comments, p. 7; Sprint Comments, pp. 16-18; MFS Comments, pp. 14-16.

7 See Comments of the People of the State of California and the Public Utilities Commission of the State of California, p. 3.

8 Id., at 3-4.

States, like California, should be free to approve interim measures and determine cost recovery issues for these measures.

3. State trials for permanent number portability should continue to provide key information in fashioning what solution is best for each particular state.

State regulators have already looked in some detail at the issues that the Commission has sought comment on in this NPRM. While this inquiry may be at different levels depending on the emergence of local competition, some states have set a date certain for the industry to come up with viable trials for long-term number portability. In California, the state regulator has overseen the development of an industry task force to address the technical questions surrounding a permanent solution. This group, called the California Local Number Portability Task Force, must report to the California Commission by January 31, 1996, on criteria for a trial of long term number portability solutions.[9]

Aware that state regulatory bodies may be farther down the road than the Commission in devising a permanent solution to number portability, commenters were nearly unanimous in opining that state trials should continue unfettered.[10] If the Commission desires a timely and technically feasible solution to number portability, it should not prejudge the outcome of these various trials. These trials are expected to yield valuable technical and business process information that will aid the industry in its quest for a permanent long-term number portability solution. Starting from ground zero

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[9] Id., at 4.

[10] See e.g., Cincinnati Bell Telephone Comments, pp. 5-6; AT&T Comments, p. 6, FN. 8; MCI Comments, pp. 5-6; MFS Comments, p. 7.

at the federal level will delay a permanent solution for states that see number portability as vital to fully implementing local competition.[11]

4. Implementation timelines for each state will be different depending on the degree of local exchange competition.

The Commission recently acknowledged that "States have a role and certain interests in the regulation of numbering resources and . . . [the Commission] . . . need not preempt states in order to take action with respect to numbering."[12] With respect to the issues here, the Commission acknowledges in this Portability NPRM ". . . that state regulators also have legitimate interests in the development of numbering portability."[13] The Commission should likewise recognize that timing issues surrounding number portability have intrastate implications that need to be addressed in the larger context of state local competition proceedings.

The timing of long-term number portability solutions should be determined by state regulatory authorities. State regulators are in the best position to determine whether local competition among service providers or local customer demand warrant what long term solutions and at what cost. We agree with some commenters that states where no local exchange competition is expected in the near future (e.g., in rural or sparsely populated areas) should not be burdened with the costs of number portability if there is no demand for it.[14]

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11 While we do not share the view that long-term number portability is as necessary to competition as others have argued, we are committed to implementing a technically feasible and cost justifiable solution in our states.

12 See In the Matter of Administration of the North American Numbering Plan, CC Docket No. 93-237, Report and Order, FCC 95-283 (adopted July 13, 1995).

13 See NPRM, para. 32, mimeo at 13.

14 See e.g., NTCA Comments, p. 3; USTA Comments, p. 5.

However, should the Commission determine that a date certain for implementing number portability nationwide is in the public interest, it should do so only after it thoroughly examines the issues so it can set a realistic implementation timeline. To do otherwise will result in a hasty and costly rush to a solution to meet an arbitrary deadline.

The Commission cannot mandate any solutions for a certain date until state number portability trials are complete. All solution proposals must be carefully considered before the Commission can predict whether such proposals can work. Only when the Commission has this information can they reasonably predict a timeframe in which the industry could possibly develop and deploy interoperable, reliable permanent solutions.

III. It is premature for the Commission to mandate a technical solution for implementing permanent number portability solutions.

1. There is no proven technical solution for number portability.

Despite the fact that some parties have put forward what they claim to be permanent number portability solutions, no solutions have been tried and tested on a large scale to date. Although MCI pronounced earlier that its Carrier Portability Code ("CPC") proposal was a proven and tested "fix" for permanent number portability,[15] in comments filed in this NPRM, MCI has back peddled. MCI now labels CPC as a mere "mid-term" solution and touts AT&T's Location Routing Number ("LRN") proposal as the real "fix" for permanent number portability.[16]

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[15] See attached press release.

[16] See MCI Comments, pp. 10-11, 15-16.

Barking at the heels of AT&T's LRN proposal is an entirely new proposal offered by Independent Telecommunications Network, Inc. ("ITN") that ITN claims is the solution.[17] We have not had the time to evaluate ITN's new proposal, but its entrance at this late date makes it clear that we have not seen the last solution that various parties might offer. And, since all proposals, including ITN's proposal, will need testing and refining, no party can answer the most significant questions raised by this NPRM.[18] In fact, the final "best" solution may not have yet been introduced.

IV. Industry members should share the financial responsibility for implementing number portability.

1. Mid-term or Entrance number portability solutions must be economically prudent.

If the Commission or the states consider mid-term or entrance solutions,[19] the solutions must be able to recover their implementation costs within the time frame that such measures exist.[20] Such measures should also have the ability to evolve into a long term solution. We are mindful of Sprint's admonition to avoid what may be costly mid-term solutions when we need to wisely expend limited resources and energy towards a permanent long term solution.[21] However, if the industry finds a cost

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17 See ITN Comments, pp. 2-5.

18 As a general rule, the FCC should give more weight to those proposals that come from parties experienced with sophisticated networks, advanced switching systems and the introduction of vertical services. Parties without experience in these areas are likely to oversimplify the technical process required for permanent portability.

19 Our Release To Pivot Proposal ("RTP") and MCI's CPC proposal are examples of mid-term or entrance number portability proposals.

20 cost recovery for these mid-term proposals must also be competitively neutral.

21 See Sprint Comments, p. 18.

effective mid-term solution that can evolve into or provide key learnings for a permanent solution, we would support such a mid-term measure.[22]

2. Long Term number portability cost recovery must be competitively neutral.

Cost recovery for number portability must be competitively neutral. Currently, cost recovery issues are being addressed by different state commissions. In California, after a solution for number portability is adopted, California will hold workshops to discuss issues related to cost recovery. If the Commission promulgates any overarching guidelines on cost recovery, the Commission should adopt the policy that cost recovery should be competitively neutral.

3. Punitive measures are inappropriate.

The responsibility for discovering a long term solution for number portability rests with all industry players, not just incumbent LECs. As such, the so-called incentive measures suggested by a few commenters illogically serve to punish only incumbent LECs for a situation that is no company's fault.[23] The Commission should not adopt these punitive measures.

Punitive measures are not necessary for motivation because states on the verge of local exchange competition already have incentive to develop a solution for number portability. Punishing incumbent LECs alone merely because a permanent solution

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[22] For example, because our RTP uses existing technologies, RTP is likely to be more cost-effective than other proposals. In addition, implementing RTP does not preclude others from implementing other solutions in their networks.

[23] See e.g., Time Warner Comments, p. 21 (LECs should provide free RCF interim portability measures until a permanent solution is found); ALTS Comments, pp. 15-16 (LECs should provide discounted services for interconnection until a permanent solution is found).

does not exist would only serve to put LECs at a competitive disadvantage once the local exchange market is open to competition.

Additionally, the punitive measures suggested by some commenters make no sense. For example, there is no link between permanent number portability and interLATA relief, price cap relief, interconnectivity issues or access revenues.[24] Denying relief to any incumbent LEC in any of these areas because of number portability issues will have no effect on when industry players discover a solution for permanent number portability. It makes no sense to condition relief for LECs in these areas dependent upon when industry participants and regulators finally settle on long term number portability solutions.

Punishing incumbent LECs for the absence of number portability is particularly inappropriate because LECs have made significant contributions in this area. For example, Pacific Bell currently co-leads the California Number Portability Task Force. The mission statement for this task force states, in part, that its goal is to "evaluate, recommend, and ultimately implement a technically and economically feasible solution for service provider number portability." Not only is Pacific Bell working on this problem as co-chair of the task force in cooperation with the state commission, but Pacific Bell is also an active member in industry fora where these issues are paramount. We participate in the INC Number Portability Workshop. We also participate on the Editorial Subcommittee for the INC Number Portability Report, and have contributed to a section in the document which details our RTP proposal. We also have

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[24] See e.g., Time Warner Comments, p. 15.

representation at Committee T1S1, which is dealing with the signaling impacts of local number portability.[25]

Unless the Commission determines that a particular company is not cooperating in industry efforts to determine a solution to number portability, or a particular company refuses to implement an agreed upon architecture for number portability, punitive measures are not equitable or justifiable.

V. The Commission should adopt the following guidelines for long term number portability solutions.

We suggest that the Commission should adopt the following national policies and guidelines to ensure network reliability and interoperability of state-adopted number portability solutions.

- Where number portability is required, it applies to geographic ten-digit NANP numbers, except in situations where industry approved service definitions limit or preclude such portability (e.g., 555).
- Care should be taken to avoid any adverse impacts to customers who do not desire number portability.
- All service providers (e.g., CMRS, IECs, CAPs, LECs, CLECs) that benefit from number portability should also participate in number portability development, deployment and associated administrative functions.

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[25] Pacific Bell has also participated in other state's proceedings. Pacific Bell has attended the Illinois Number Portability Task Force proceedings sponsored by the ICC. Pacific Bell is also responding to the Maryland Commission's Number Portability Call Model Framework RFP (at their request) with our RTP proposal. The Georgia Public Service Commission has also asked us to present our RTP proposal in their industry meetings to be held in November, 1995.

- All service providers (e.g., CMRS, IECs, CAPs, LECs, CLECs) offering portability within the same specific geographic area should interconnect through the public switched network and allow for call completion. The method of interconnection (direct, tandem, hub, etc.) is a business decision for the service provider requesting interconnection.
- Customers should have the option of retaining their geographic telephone number as they change between service providers (e.g., CMRS, IECs, CAPs, LECs, CLECs) serving the same specific geographic area. The obligation to provide number portability should be borne by all service providers as required by appropriate regulatory bodies with jurisdiction over a common geographic boundary area.
- To the extent possible, architectures proposed for the support of number portability should allow network providers reasonable flexibility in the manner in which the architecture is implemented. Specifically, architectures which require an external database(s) solution should not preclude any carrier from incorporating the database(s) in their own internal network.
- The Commission should adopt the definitions for the various forms of portability defined by the INC in order to avoid misinterpretation in the future and guide the efforts of industry groups addressing the details of portability.
- Number portability should be efficiently and fairly deployed where economically reasonable and technically feasible.

- The experience of various trials now underway or in the process of being developed should be examined to gain an understanding of what is economically reasonable and technically feasible.
- Any long term portability solution must provide for uninterrupted call processing, the interworking of all services and the ability to evolve to, or integrate with, solutions for other appropriate types of number portability.
- The process of implementing any number portability solution cannot be allowed to degrade the quality of service provided to customers.
- The expertise of the industry in dealing with the various number portability issues and solutions should be tapped to determine appropriate architectures, standards, technical and performance criteria and implementation plans.
- The use of interim solutions and enhancements to those solutions should be encouraged in order to provide consumer benefits until permanent solutions are available.
- The communications industry as a whole should jointly assume the costs, burdens and responsibilities for permanent number portability.

CONCLUSION

For the reasons stated in our comments, we believe the Commission should develop national policies and guidelines for permanent number portability but leave technical, interim and implementation cost issues to state commissions and appropriate industry fora.

Respectfully submitted,

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Attachment

ATTACHMENT

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MCI AND INDUSTRY LEADERS DEMONSTRATE TRUE LOCAL TELEPHONE NUMBER PORTABILITY SOLUTION

Solution Will Promote Local Telephone Competition

Washington, D.C., May 9, 1995 – MCI and a team of leading telecommunications companies today demonstrated a true local number portability solution that enables consumers to keep their telephone number and enjoy advanced calling features when switching to a competing local telephone company. This solution removes a major barrier to effective local telephone competition.

This number portability solution represents a combined effort of MCImetro, DSC Communications, Nortel, Siemens Stromberg-Carlson, and Tandem Computers, Inc. Utilizing currently available technology and existing industry standards, the companies developed software which operates with the switching and signaling equipment currently deployed in local telephone networks. This new architecture provides a more robust solution than current temporary "call forwarding" methods.

(more)

Number portability is a key consumer concern and is vital to the successful implementation of local telephone competition. A nationwide Gallup survey showed that nearly 90 percent of business customers would not switch to a competing local telephone company if they could not keep their phone number.

"The right of telephone users to retain their telephone number when changing to another local telephone company is essential to fair and effective competition in the local market," said Gary Parsons, CEO for MCImetro. "Today's announcement and demonstration prove the technical viability of true number portability and are critical first steps toward removing this major barrier to competition. This solution eliminates the cost and complexity concerns which to this point have raised major questions about the feasibility of local number portability."

This team of vendors today demonstrated this true local number portability solution at the Association for Local Telecommunications Services (ALTS) conference, "Pathways to the Telecommunications Future: Policies for Creating a Competitive Local Marketplace" in Washington, DC.

"We will no longer wait for the incumbent local exchange carriers to tell the industry that either there are no solutions to problems, or if solutions exist, they are technically cumbersome too expensive" said Heather Burnett Gold, ALTS president. "The competitive industry is moving ahead. They are ready to give to consumers the same benefits of lower prices, greater choice and more innovative service in the local market that they now enjoy in the competitive long distance and customer premises market, and they will find ways to do it that offer greater convenience to the customer."

(more)

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A central component of this solution is software that uses a three-digit Carrier Portability Code (or CPC) which communicates routing instructions to the network by identifying the carrier that is to receive the call. The CPC software used in the signaling between different telecommunications networks allows customers to receive calls directly from their chosen service providers without changing numbers and without having to dial additional digits to complete calls.

Contrasted to temporary "call forwarding" measures proposed by the local telephone companies, this true local number portability solution is consumer-friendly. It protects the customer's access to advanced Caller ID services, produces faster call set-up and improves data and voice transmission when compared to call-forwarding.

The CPC solution is also competition-friendly. This solution does not require the incumbent telephone company to continue switching every customer call. With true local number portability, customers and their new service providers have control over the switching of calls to and from the customer.

The CPC software employs a database design and hardware which is compatible with systems used currently to complete 1-800 calls nationwide and systems being deployed for Advanced Intelligent Networks (AIN). Given the industry's experience with 800 portability ... AIN, it is possible for deployment to begin in some locations as early as six months pending local regulatory mandate.

The next step for this true number portability solution will be further demonstrations and discussions with state public service commissions and other equipment vendors to solicit comments and support.

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TRUE LOCAL NUMBER PORTABILITY
Delivering the Benefits of Local Competition

Like the long distance industry, competition for local telephone service will deliver the benefits of choice, savings and innovation to all consumers. One factor critical to the delivery of these benefits to local telephone customers is the issue of local number portability.

Your Right to Keep Your Phone Number:

Local number portability is the customers' right to retain their telephone number when switching to a competing local telephone company. Without local number portability, customers say they would be unwilling to switch companies. According to a recent Gallup survey, nearly 80 percent of residential customers would be unwilling to choose a new carrier if it also meant changing their phone number.

For business customers, the real cost of changing telephone numbers is even greater. When a business changes its telephone number, it has to reprint all of its stationery, business cards, advertisements, etc. Consequently, Gallup found that nearly 90 percent of business customers willing to consider a switch in local telephone companies would not do so if it meant changing their phone number. Clearly, local number portability is vital to the success of effective competition in local telephone markets.

Interim Measures- No Substitute for the Real Thing:

Until now, only interim measures have been devised -- mainly by the local exchange companies -- to address number portability . These measures typically represent an extension of today's call forwarding technology and allow the monopoly telephone companies to maintain control over individual calls, rather than providing a credible, long-term solution. The two interim measures most commonly suggested by the local exchange companies are Remote Call Forwarding (RCF) and DID trunking (DID). Each of these two measures results in:

- The local exchange company's involvement in the processing of every call
- Inability to handle advanced features such as Caller ID
- Increased time required to connect a telephone call
- Decreased transmission quality for voice and data

The concept of local competition is to let customers choose which company provides their service without suffering a loss of convenience, quality or features. In many cases, the monopoly local telephone companies have proposed a charge for customers keeping their numbers, often at rates many times higher than the cost of providing the service. On all of these fronts, the temporary call forwarding solutions fail to meet customers needs for convenience, quality and features when retaining their telephone number.

Carrier Portability Code (CPC) Solution-
A Long-Term Solution with Broad Industry Support:

A multi-vendor team including MCImetro, DSC Communications Corporation, NorTel, Siemens Stromberg-Carlson and Tandem Computers Incorporated designed and tested a true long-term solution for providing local number portability. The CPC solution uses a set of regional databases which hold information on each telephone line in a given area code. The CPC method is similar to the way that 800 numbers are accessed, with a set of databases that tell the network where to send a call.

Given the success that the long distance industry enjoyed in designing and implementing 800 number portability, it is reasonable to expect that the CPC solution for true local number portability could be implemented within one year of a regulatory mandate and at a feasible cost.

The CPC solution for true local number portability has been tested extensively in the lab. The CPC solution has been engineered to work reliably with a wide variety of local telephone systems, both landline and wireless. The CPC solution allows customers to choose their local telephone company and be fully served by that company, using whatever basic or advanced features they choose.

With CPC as a viable solution for true local number portability, and with a growing demand for real competition in local telephone markets, the responsibility now lies with state regulators to order the implementation of true local number portability and effective local competition.